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Federal Elections Commission 999 E Street NW Washington, DC 20463

MUR# 6012

2008 MAY 14 AM 10: 42 T

re: possible REC rules & regulations violations in the campaign of James E Risch for the United States Senate Primary Race in the State of Idaho

I wish to file a complaint with the FEC.

This letter is to request that the FEC look into the financial statements posted by James E Risch and the Jim Risch for US Senate Committee regarding movements of various monies and payments to and from his campaign and himself. There appear to be numerous misleading or incomplete entries that would seem to indicate violations of the FEC Rules & Regulations.

I would ask that the Commission specifically address the following issues in a timely manner, je before the primary election to be held on May 27th, 2008 in the State of Idaho.

- 1. On mr Risch's Schedule B (FEC Form 3), page 174 of 183; Item A lists the Central Bank of Hagerstown, MD, as having issued a check on February 20th, of 2008, in the amount of Seventy (\$70.00) dollars for the Purpose of Disbursement Fund raising Settlement Fees. Listed as Primary expense. What legal issues required a settlement and settlement fees?
- 2. Item B lists Chase Bank, dba Chase Card Services in Palatine, IL, as having been issued credit card payment of Thirty-four hundred fifty-nine dollars and fifty-five cents (\$3459.55) that the Purpose of Disbursement lists for travel and other see memo. Listed as Primary Expense.
- 3. Item C lists a payment of seven hundred forty-two dollars and thirty-seven cents (\$742.37) under the Purpose of Disbursement Hotel. Listed as Primary Expense.

The total expenditures listed on this page, items A, B, and C amount to the sum of Four-thousand two hundred and seventy-one dollars and ninety-two cents (\$4271.92) not the Thirty-five hundred twentynine dollars and fifty-five cents (\$3529.55) shown.

Additionally, since all banks used are to be listed, does the use of a credit card, which is legally an open-ended short term loan from a bank, in this case Chase Bank; does this campaign usage not constitute a violation of the FEC Rules & Regulations? The name or names on the card are not listed, again an apparent violation of FEC Rules & regulations. The candidate has not disclosed the type of card. Is it a personal card, a business card in James E Risch's name, a business card in the name(s) of the four partners/owners of his law firm, or someone else's card?

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Page two

The Schedule C (FEC Forms 3) Page 181 of 183 lists as item A, a loan from James E Risch's (Personal Funds) in the amount of Two Hundred and Fifty Thousand dollars (\$250,000) made on March 31*, of 2008. That loan is marked General under the category box and listed as G2008.

The General Election will be held on May 27th, of 2008, which is three weeks from yesterday.

Is this loan legal for use by a candidate who is not (yet) the candidate of any political party, and cannot be listed as such until May 28th?

To me, it seems as if he presumes to be the General Election Candidate, when in fact, as of the date the loan was made he was not, and is not today, and legally and physically cannot be a General Election candidate until the votes are tallied on May 27th and May 28th and a winner of the primary is announced.

Also, on Page 169 of 183 of Schedule B (FEC Form 3):

Item A lists another payment, on February 20th, 2008, to Chase Bank, aka Chase Card Services, Purpose of Disbursement Paraphernalia, Signs, Stickers, and Cards in the amount of Fifteen Hundred and Seventy-Seven dollars and sixty-three cents (\$1577.63)

Item B lists a payment, made on February 20th, 2008 to Complete Campaigns.com in San Diego, CA, for technology services in the amount of Four Hundred sixty-five dollars (465.00) If you type in the name as listed in the candidate's disclosure information, no such company exists on the Internet.

Item C lists a payment, made on February 20th, of 2008, to US Airways, in the sum of Six Hundred fifty-two dollars (\$652.00). Under Purpose of Disbursement, the purpose is not listed; which is again, a violation of FEC Rules & Regulations.

Also, on Page 186(?) of 183 (yes, I am confused too, but the data listed is a poor copy of a copy copied and posted on the Internet

Item C is a payment made to Chase Bank, aka Chase Card Services, for Travel and Other in the amount of Eleven Hundred and eighty-eight dollars and ninety-five cents (\$1188.95). Again, I question if the use of Chase Bank is a violation of FEC Rules & Regulations? What does "other" mean?

Page 3

Also, on page 153 of 183:

Item C is a payment made to Risch, Goss, Insinger, and Gustavel in the amount of Twenty-five Hundred Dollars. Purpose of Disbursement is listed as Overhead and Office Services. This is a clear cut violation of FEC Rules & Regulations which do not allow a candidate to pay himself out of campaign funds. Any monies paid by the campaign to the law firm constitute income, and the candidate cannot pay himself for working on his campaign.

This violation occurs at least three times, and is listed on Pages 153, 165, and 177. The sum total of those three payments is Seventy-five Hundred dollars, one-fourth of that income goes to James E Risch as a partner and part owner of that law firm.

Also, on Page 152 of 183

Item A lists a payment to John Insinger in the amount of Five Thousand Dollars (\$5000.00) for Legal Services and FEC Compliance. I find it disturbing that James E Risch and his committee believe that it is legal to pay a member/partner in the law firm of Risch, Goss, Insinger, and Gustavel to do work related to his campaign. Most businesses do not allow employees to work on job-related matters that are in conflict with his position at his workplace. (in this situation, John Insinger is a law partner in Risch, Goss, Insinger and Gustavel. He can only have performed the above listed blanket services, including filing during regular business hours. During that time he is an attorney/partner in the law firm of Risch, Goss, Insinger, and Gustavel. Those monies should be income to the law firm, in which James E Risch is also a partner and beneficiary of presumptively one-fourth of all income to the firm.

James E Risch also shows payments to Chase Bank aka Chase Card Services, for various campaign expenses. This is a violation, I believe, of the Requirement To File Banks. Under Chart 3 of the FEC Site, Idaho, it states so. These payments amount to concealment of expenses. Specifically Page 152 of April Quarter Disbursements shows a payment to Chase Bank of Twenty-one hundred five dollars and two cents (\$2100.05). Again, this and other payments to Chase Bank amount to violations in the area of concealment of expenses.

There appears to be a significant amount of co-mingling of personal, campaign, and business monies between James E Risch, Jim Risch for US Senate committee, John Insinger, and the law firm of Risch, Goss, Insinger, and Gustavel. Significant monies, including listed personal loans to James E Risch and his campaign of Three Hundred and Eighty Thousand dollars. I question if and how James E Risch accumulated the Quarter of a Million Dollars loaned to his campaign, and the other loan in the amount of One Hundred Thirty Thousand dollars (\$130,000.00); and his use of General (Election) campaign contributions, primarily from out-of-state Special Interest Groups and PAC's in the Primary. Especially given the fact that James E Risch does not appear to be campaigning in the Primary itself. That General funding, under FEC Rules & Regulations is supposed to be used during (and only during) the General Election Campaign.

This would seem to also be in violation of the rules as listed in Chart 3-B: Expenditure Limitations, where it states: "Expenditures may not be made in a manner that conceals the identity of the Individual or Organization making the payment. Each expenditure of \$25 or more must be vouched for by a receipt or canceled check. I doubt that James E Risch or his campaign committee, or the law firm of

Page 4

Risch, Goss. Insinger, and Gustavel could produce these canceled checks, or receipts for specific expenditures of Twenty-five dollars (\$25.00) or more as is required in Chart 3-B Expenditure Limitations if asked to. The Regulation is very clear in stating that all such payments totaling Twenty-five dollars or more must be vouched for by a receipt or canceled check.

James E Risch's filings seem to suggest a pattern of loose accounting, and generalized payments instead of the specifics called for in the FEC Rules & Regulations.

I have other concerns about the Jim Risch for US Senate committee, James E Risch, and the law firm of Risch, Goss, Insinger, and Gustavel and what other violations of the FEC Rules & Regulations may have taken place up thru todays date.

A Concerned Idaho Citizen

Richard W Keyser

Nampa, Idaho 83651

signed and sworn to before me on

8,2008

CHART 3-B: EXPENDITURE LIMITATIONS

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